

I am requesting a hearing be scheduled on this matter.

☐ Certification of Default filed by Standing Chapter 13 Trustee

OR

I am requesting a hearing be scheduled on this matter.

☐ Certification of Default filed by _____, creditor,

A hearing has been scheduled for _____ 7/28 _____ at _____ 10 _____ a.m.

☒ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

OR

A hearing has been scheduled for _____ at _____ a.m.

☐ 1. Motion for Relief from the Automatic Stay filed by _____, creditor,

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

☒ TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT
☐ CREDITOR'S MOTION or CERTIFICATION OF DEFAULT
CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

In Re:		Kimberly A. Thomas	
Caption in Compliance with D.N.J. LBR 9004-2(c)		UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Attorney for Debtor, Kimberly A. Thomas I.D.#JW4851 (908) 850-6161 Hackensack, NJ 07850 699 Washington Street, Suite 103 Joan Sirkis Warren, Esq. LAVERY & SIRKIS, ESQUIRES			
Case No.:	19-31389	Judge:	MBK
Chapter:	13		

Local Form 23, rev. 6/20/06jml

If this form is not filed the Motion or Certification of Default will be deemed uncontested and no hearing will be scheduled.

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a Creditor's Certification of Default (under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions) or a Trustee's Certification of Default.

NOTE:

Date: 06/15/21
Date: 6/15/21
Debtor's Signature
Debtor's Signature
/s/ Kimberly A. Thomas

4. I certify under penalty of perjury that the foregoing is true and correct.
3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
2. I am objecting to the above for the following reasons (choose one):
 - ☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached hereto.
 - ☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

 - ☒ Other (explain your answer): My attorney is filing a modified plan to take the vehicle out

